

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

PROJECT VOTE/VOTING FOR	:	
	:	
Plaintiff,	:	
v.	:	Case No.: 2:10cv75
	:	
ELISA LONG and NANCY RODRIGUES,	:	
	:	
Defendants.	:	

**ANSWER AND AFFIRMATIVE DEFENSE OF
DEFENDANT ELISA LONG**

Defendant, Elisa Long, by counsel, for her answer to plaintiff's Complaint states:

ANSWER

1-3. Denied. Defendant denies the allegations of these paragraphs as conclusions of law.

4. Admitted in part; Denied in part. Defendant admits only that she denied plaintiff access to rejected voter applications in accordance with her interpretation of the applicable law. Defendant is without sufficient information or knowledge upon which to form a belief as to the truth of the remaining allegations and therefore denies same.

5-6. Denied. The allegations of these paragraphs are denied to the extent they are inconsistent with Virginia law.

7-9. Denied. The allegations of these paragraphs are denied to the extent they are inconsistent with federal law.

10-11. Denied. The allegations of these paragraphs are denied to the extent that they are inconsistent with Virginia law.

12. Denied.

13. Denied.

14. Denied. Defendant is without sufficient information or knowledge upon which to form a belief as to the truth of the allegations of this paragraph and therefore denies same.

15-17. Denied. The documents referenced in these paragraphs speak for themselves.

18. Denied. Defendant is without sufficient information or knowledge upon which to form a belief as to the truth of the allegations of this paragraph and therefore denies same.

19. Admitted.

20-22. Denied. Defendant is without sufficient information or knowledge upon which to form a belief as to the truth of the allegations of these paragraphs and therefore denies same.

23. Admitted in part and denied in part. The defendant admits the allegations of the first sentence in paragraph 23 and denies the allegations in the second sentence.

24-25. Denied.

26. Defendant incorporates by reference her responses to paragraphs 1 – 25 as if set forth at length.

27-28. Denied as a conclusion of law.

29-31. Denied.

32. Any paragraph of the complaint not specifically addressed is hereby denied.

AFFIRMATIVE DEFENSES

1. Plaintiff's Complaint fails to state a claim upon which relief may be granted.

2. Article I, § 4 of the United States Constitution gives Virginia the right to regulate the administration of elections in Virginia in a manner consistent with federal law.

The defendant reserves the right to present other defenses as they become known during the course of this litigation.

ELISA LONG

By: _____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of November, 2010, I electronically filed the foregoing ***ANSWER AND AFFIRMATIVE DEFENSE OF DEFENDANT ELISA LONG*** with the clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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